

JOINT PROPOSED PRETRIAL ORDER
Pulliam v. County of Fort Bend, Texas, et al.
Case No. 4:22-cv-4210

ATTACHMENT G

Joint Trial Worksheet

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JUSTIN PULLIAM,

Plaintiff,

v.

Civil Action No. 4:22-cv-4210

COUNTY OF FORT BEND, TEXAS; SHERIFF ERIC FAGAN, in his individual capacity; OFFICER ROBERT HARTFIELD, in his individual capacity; OFFICER JONATHAN GARCIA, in his individual capacity; OFFICER TAYLOR ROLLINS, in his individual capacity; and OFFICER RICKY RODRIGUEZ, in his individual capacity,

Defendants.

JOINT TRIAL WORKSHEET

OPENING

Minutes Requested by Plaintiff: 30
Minutes Requested by Defendants: 30

EVIDENCE

Witness Name:	Justin Pulliam (Plaintiff)	
Subject Matter:	Personal background as an independent citizen journalist; typical encounters with law enforcement, including Fort Bend County Sheriff's officers; the July 12, 2021 press conference; December 21, 2021 exclusion from scene and arrest; indictment and trial following December 21, 2021 arrest; Fort Bend County's other arrests for interference with public duties; damages	
Time for Direct:	4 hours	Time for Cross: 3 hours

Witness Name:	Deputy Ricky Rodriguez	
Subject Matter:	Personal background; Pulliam's exclusion from scene and arrest on December 21, 2021. Edwin Kraft's history.	
Time for Direct:	30–45 minutes	Time for Cross: 1 hour

Witness Name:	Lieutenant Taylor Rollins (Defendant)	
Subject Matter:	Personal background; Pulliam's exclusion from scene and arrest on December 21, 2021. Edwin Kraft's history.	
Time for Direct:	60–90 minutes	Time for Cross: 2 hours

Witness Name:	Sheriff Eric Fagan (Defendant)	
Subject Matter:	Personal background and election to Sheriff; Fort Bend County Sheriff's Office policies; personal interactions with Pulliam and Fort Bend County Sheriff's Office's customs and policies concerning Pulliam; events at and near Jones Creek Ranch Park on July 12, 2021; Pulliam's exclusion from scene and arrest on December 21, 2021; visit to Pulliam in Fort Bend County Jail; Fort Bend County Sheriff's Office actions following Pulliam's arrest	
Time for Direct:	1–2 hours	Time for Cross: 2 hours

Witness Name:	Detective Travis James	
Subject Matter:	Personal background; Pulliam's December 21, 2021 arrest and the subsequent investigation	
Time for Direct:	20–30 minutes	Time for Cross: 1 hour

CLOSING

Minutes Requested by Plaintiff: 30 minutes

Minutes Requested by Defendant: 30 minutes

Additional informational information that may impact the amount of time needed for trial of this case:

- **Plaintiff:** Much of the testimony will involve video recordings and therefore time for each witness includes the time to watch video excerpts. Plaintiffs have scheduled a technology orientation for the courtroom and, barring any glitches with the new system, do not anticipate any technology problems presenting video.
- **Defendants:** Technology issues may impact time needed for trial.

Total Number of Hours and Minutes Estimated for Trial:

by Plaintiff: 9.75 hours

by Defendant: 8.5 hours

Dated: July 1, 2025

Respectfully submitted,

/s/ Christen Mason Hebert
Christen Mason Hebert, Attorney-in-Charge
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Attorneys for Plaintiff

Admitted *pro hac vice

Dated: July 1, 2025

/s/ Kevin Hedges

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2025, I electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system and served by the CM/ECF system to all counsel of record.

/s/ Christen Mason Hebert
Christen Mason Hebert, Attorney-in-Charge

Counsel for Plaintiff